

Motor & Equipment Manufacturers Association

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December 10, 2018

The Honorable Heidi King
Deputy Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590

RE: Advanced Notice of Proposed Rulemaking; Pilot Program for Collaborative Research on Motor Vehicles with High or Full Driving Automation [Docket No. NHTSA-2018-0092]

Dear Deputy Administrator King:

The Motor & Equipment Manufacturers Association¹ (MEMA) – a leading trade association representing vehicle suppliers – has long supported the endeavors of the National Highway Traffic Safety Administration (NHTSA) to better understand automated driving systems (ADS), including federal guidelines and agency research programs.

Vehicle suppliers are key developers of advanced, transformative technologies that enable safer, smarter, and more efficient vehicles.² Suppliers have made significant investments in research and development, design, and validation testing to produce a wide range of advanced crashworthiness, crash avoidance, and mitigation safety innovations for their vehicle manufacturer customers, a.k.a. original equipment manufacturers (OEMs).

MEMA welcomes the release of the ANPRM and NHTSA's willingness to consider feedback on several critical issues, including additional mechanisms to remove obstacles to the testing of advanced AV-related features and technology. MEMA is not able to provide comments to the agency on this matter at this juncture. We would appreciate an opportunity to provide comments to the docket when we have had more time to discuss the subject with our members. These are complex issues and we simply need more time to evaluate the agency's notice.

MEMA continues to applaud NHTSA's commitment to receiving stakeholder input and to staying current on the latest information and research related to ADSs. We look forward to continued dialogue.

Regards,

A handwritten signature in black ink that reads "Leigh S. Merino". The signature is written in a cursive, flowing style.

Leigh S. Merino
Senior Director, Regulatory Affairs

¹ MEMA represents 1,000 vehicle suppliers in the fast-changing mobility industry that manufacture and remanufacture components and systems for use in passenger cars and heavy trucks as new original equipment (OE) and aftermarket parts to service and repair vehicles. MEMA represents its members through four divisions: Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); Motor & Equipment Remanufacturers Association (MERA); and, Original Equipment Suppliers Association (OESA).

² ["Driving the Future: The Economic Impact of the Motor Vehicle Parts Manufacturing Industry on the United States,"](#) MEMA and Boston Consulting Group, January 2017.

